SOUTHERN DISTRICT OF NEW YORK	
In re	:
	: Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
Debtors.	: (Jointly Administered)
	•
	: X

AFFIDAVIT AND DISCLOSURE STATEMENT OF JONATHAN SCOTT NASH QC

CITY OF LONDON)	
) s	S
COUNTRY OF THE UNITED KINGDOM)	

JONATHAN SCOTT NASH QC, being duly sworn, upon his oath, deposes and says:

- I am a Queen's Counsel, located at 3 Verulam Buildings, Gray's Inn,
 London WC1R 5NT.
- 2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, "Lehman"), have requested that I provide legal advice to the Debtors, and I have consented to provide such services.
- 3. I may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of my customary practice, I am retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. I

do not perform services for any such person in connection with these chapter 11 cases. In addition, I do not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

- 4. I have not agreed to share and will not share any portion of the compensation to be received from the Debtors with any other person other than by discharging the regular expenses incurred in connection with the administration of barristers chambers of which I am a member.
- I do not hold or represent any interest adverse to the Debtors or their estates.
 - 6. The Debtors do not owe me anything for prepetition services.
- If at any time during the period of my employment, I discover any facts bearing on the matters described herein, I will supplement the information contained in this Affidavit.

By: / Mul Mr.

Subscribed and sworn to before me this 7 day of / 2010

Notary Public

ANN FRANCES STANYER
ATRIM COURT
15 JOCKEY'S FIELDS
HOLBORN, LONDON, WC1R 4QR
NOTARY PUBLIC & SOLICITOR

US_ACTIVE:\\d3305616\\01\\58399.0003

SOUTHER	TATES BANKRUPTCY COURT N DISTRICT OF NEW YORK	v	
In re		Chapter 11 Case No.	
LEHMAN	BROTHERS HOLDINGS INC., et al.,	08-13555 (JMP)	
	Debtors.	: : (Jointly Administered) :	
	RETENTION QUESTION	NAIRE	
	MPLETED BY PROFESSIONALS EMPLOS HOLDINGS INC. OR ANY OF ITS DEB §")		
***************************************	LE THIS QUESTIONNAIRE WITH THE OF FOR FILING BY THE DEBTORS, TO:	COURT.	
	l, Gotshal & Manges LLP		
	Fifth Avenue York, New York 10153		
	: Jennifer Sapp Christopher Stauble		
	is must be answered. Please use "none," "none," If more space is needed, please complete o	• •	
1.	Name and address of firm:		
	Jonathan Scott Nash QC, 3 Verulam Buil	dings, Gray's Inn, London	
	WC1R 5NT		

19 February 2010

Date of retention:

2.

LA FILL	
Brief	description of services to be provided:
<u>Advi</u>	ce in relation to claims to recover sums due under derivatives
trans	actions entered into pursuant to the ISDA Master Agreement,
partic	cular the effect of clause 2(a)(iii) of the Master Agreement in t
circu	mstances of the bankruptcy of the Debtors, and litigation in re
there	to.
Arraı	ngements for compensation (hourly, contingent, etc.)
Arrai <u>Hour</u>	
Hour	
	ly
Hour	Average hourly rate (if applicable):
<u>Hour</u> (a)	Average hourly rate (if applicable): £500 Estimated average monthly compensation based on prepetit
<u>Hour</u> (a) (b)	Average hourly rate (if applicable): £500 Estimated average monthly compensation based on prepetit retention (if firm was employed prepetition):
Hour (a) (b)	Average hourly rate (if applicable): £500 Estimated average monthly compensation based on prepetit retention (if firm was employed prepetition): N/A
Hour (a) (b) Prepe	Average hourly rate (if applicable): £500 Estimated average monthly compensation based on prepetit retention (if firm was employed prepetition): N/A etition claims against the Debtors held by the firm: unt of claim: \$N/A
Hour (a) (b) Prepe Amo Date	Average hourly rate (if applicable): £500 Estimated average monthly compensation based on prepetit retention (if firm was employed prepetition): N/A etition claims against the Debtors held by the firm: unt of claim: \$N/A

Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm:
Name: N/A
Status: N/A
Amount of Claim: \$N/A
Date claim arose: N/A
Source of claim: N/A
Stock of the Debtors currently held by the firm:
Kind of shares: None
No. of shares: N/A
Stock of the Debtors currently held individually by any member, associate or professional employee of the firm:
Name: N/A
Status: N/A
Kind of shares: N/A
No. of shares: N/A
Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.
None
None

11.	Name of individual completing this form:

Jonathan Scott Nash QC